

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of  
Telecommunications and Energy on its own motion  
pursuant to G.L. c. 159, §§ 12 and 16, into Verizon  
New England Inc., d/b/a Verizon Massachusetts'  
provision of Special Access Services.

D.T.E. 01-34

**WORLDCOM'S FIRST SET OF INFORMATION  
REQUESTS TO VERIZON**

WorldCom, Inc. hereby submits to Verizon Massachusetts ("Verizon") the following information requests. The Department's Ground Rules concerning information requests are incorporated herein by reference.

**INFORMATION REQUESTS**

1. With respect to (1) the facilities ordered by Bloomberg Financial Services and associated with Verizon Order # C2XT2690, (2) the facilities ordered by Bloomberg Financial Services and associated with Verizon Order # C2AN9686, and (3) any other facilities ordered by Bloomberg Financial Services that Verizon believes may be the "back up" orders referred to in Attachment C of the Direct Testimony of Karen K. Furbish (collectively, the "Bloomberg Back-Up Orders"), please provide the following information and documents:
  - (a) Identify which of the work flow processes delineated in the several work flow process documents handed out by Verizon at the Department's December 13, 2001 technical conference in this matter most closely matches the work flow process for each of the Bloomberg Back-Up Orders.
  - (b) Identify whether the work flow process for each of the Bloomberg Back-Up Orders is identical to the work flow process document responsive to question 1 (a), above. To the extent the work flow process for any of the Bloomberg Back-Up Orders differs from the work flow process identified in response to question 1(a), identify with specificity what the differences are

and provide a work flow process document that conforms to the process actually followed.

- (c) Using, as appropriate, the work flow process document identified in response to question 1(a) or the work flow process identified in response to question 1(b), identify the date(s) on which each step in the work flow process occurred for each of the Bloomberg Back-Up Orders (*e.g.*, the date on which the end user requested service, the date a specialist requested a circuit ID, the date on which due date availability was confirmed) and provide all documentation corresponding to each step in the process (notes, database entries or screen-prints corresponding to the initial request for service, NSRS entries “for tracking purposes,” database entries or other records concerning contact with the customer to confirm due date and establish appointment timeframe, all “Order Typist’s” entries, etc.).
2. To the extent not already provided in response to request 1 above, please provide a detailed description of, the results of, and all documents gathered or generated pursuant to, the Verizon investigation referred to in the letter of Barbara Anne Sousa to Christopher J. McDonald dated March 7, 2002.

Respectfully submitted,

WORLDCOM, INC.

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Dated: New York, New York  
March 14, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing upon each person designated on the attached service list by email and either U.S. mail or overnight courier.

Dated: New York, New York  
March 14, 2002